

Guy Ruttenberg, Bar No. 207937  
[guy@ruttenberglaw.com](mailto:guy@ruttenberglaw.com)  
Steve A. Papazian, Bar No. 288097  
[steve@ruttenberglaw.com](mailto:steve@ruttenberglaw.com)  
RUTTENBERG IP LAW,  
A PROFESSIONAL CORPORATION  
1801 Century Park East, Suite 1920  
Los Angeles, CA 90067  
Telephone: (310) 627-2270  
Facsimile: (310) 627-2260

*Attorneys for Plaintiff Cadence Design Systems, Inc.*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CADENCE DESIGN SYSTEMS, INC., *a*  
*Delaware Corporation,*

Plaintiff,

vs.

SYNTRONIC AB, *a Publikt Aktiebolag,*  
SYNTRONIC RESEARCH AND  
DEVELOPMENT USA INC., *a California*  
*Corporation,* SYNTRONIC (BEIJING)  
TECHNOLOGY R&D CENTER CO., LTD.,  
*a Chinese Corporation,*

Defendants.

Case No. 3:21-cv-03610-SI

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE BRIEFING AND  
HEARING RE DEFENDANTS' MOTION  
TO DISMISS (DKT. NO. 12)**

Judge: Hon. Susan Illston

1 WHEREAS, Plaintiff Cadence Design Systems, Inc. (“Cadence”) filed its Complaint  
2 against Defendants Syntronic AB, Syntronic Research and Development USA, Inc., and Syntronic  
3 (Beijing) Technology R&D Center Co., Ltd. (collectively, “Defendants”) on May 13, 2021 (Dkt.  
4 No. 1);

5 WHEREAS, Defendants filed a Motion to Dismiss on July 8, 2021 with respect to  
6 Plaintiff’s May 13, 2021 Complaint (Dkt. No. 12);

7 WHEREAS, Cadence’s opposition to Defendants’ Motion to Dismiss is due on July 22,  
8 2021;

9 WHEREAS, Cadence intends to file an amended Complaint to supersede its May 13, 2021  
10 Complaint pursuant to Fed. R. Civ. P. 15(a)(1);

11 WHEREAS, Cadence and Defendants agree that a two-week extension to Cadence’s  
12 opposition to Defendants’ Motion to Dismiss would be appropriate so that Cadence can file its  
13 amended Complaint and the parties can further confer regarding Defendants’ Motion to Dismiss;

14 THEREFORE, it is hereby agreed and stipulated by and among the Parties, with the Court’s  
15 consent, as follows:

- 16 1. The last day for Cadence to file its opposition to Defendants’ Motion to Dismiss is  
17 continued from July 22, 2021 to August 5, 2021.
  - 18 2. If Plaintiff fails to file an Amended Complaint and instead Opposes the Motion to  
19 Dismiss the last day for Defendants to file any reply in support of their Motion to  
20 Dismiss will be continued from July 29, 2021 to August 12, 2021.
  - 21 3. If Plaintiff fails to file an Amended Complaint and instead Opposes the Motion to  
22 Dismiss the hearing on Defendants’ Motion to Dismiss shall be continued from 10:00  
23 AM on August 13, 2021 to 10:00 AM on August 27, 2021.
  - 24 4. This Stipulation does not affect any other dates ordered by the Court or agreed to by  
25 the parties.
- 26  
27  
28

IT IS SO STIPULATED AND REQUESTED.

DATED: July 20, 2021

By: /s/ Steve Papazian

Guy Ruttenberg  
Steve Papazian  
RUTTENBERG IP LAW, A PROFESSIONAL  
CORPORATION  
1801 Century Park East, Suite 1920  
Los Angeles, CA 90067  
Telephone: (310) 627-2270  
Facsimile: (310) 627-2260  
[guy@ruttenbergiplaw.com](mailto:guy@ruttenbergiplaw.com)  
[steve@ruttenbergiplaw.com](mailto:steve@ruttenbergiplaw.com)  
*Attorney for Plaintiff*

DATED: July 20, 2021

By: /s/ Jason N. Haycock

Edward P. Sangster,  
[edward.sangster@klgates.com](mailto:edward.sangster@klgates.com)  
Jason N. Haycock,  
[jason.haycock@klgates.com](mailto:jason.haycock@klgates.com)  
K&L Gates LLP  
Four Embarcadero Center, Suite 1200  
San Francisco, CA 94111  
Telephone: +1 415 882 8200  
Facsimile: +1 415 882 8220

Jeffrey C. Johnson  
[jeff.johnson@klgates.com](mailto:jeff.johnson@klgates.com)  
Paul J. Bruene,  
[paul.bruene@klgates.com](mailto:paul.bruene@klgates.com)  
K&L Gates LLP  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104  
Telephone: + 1 206 623 7580  
Facsimile: + 1 206 623 7022

*Attorneys for Defendants Syntronic AB, Syntronic  
Research and Development USA Inc., and Syntronic  
(Beijing) Technology R&D Center Co., LTD.*

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Susan Illston  
United States District Judge